

JO

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DEL MONTE SAVER PLAN,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	CIVIL ACTION NO. 06-0503
	:	
JOANN TRIPP and THE ESTATE	:	
OF PAUL YOUNG,	:	
	:	
Defendant.	:	

STIPULATION FOR JUDGMENT

Del Monte Saver Plan (the "Saver Plan"), Joann Tripp ("Defendant Tripp") and The Estate of Paul Young ("Defendant Estate" and together with the Saver Plan and Defendant Tripp, the "Parties"), through their undersigned counsel, hereby stipulate as follows in the above-captioned action ("Action"):

1. The following distributions will be made from the amount of \$21,866.21 plus interest that was deposited into an interest bearing account with the Clerk of Courts for the United States District Court for the Middle District of

Pennsylvania ("Clerk of Courts") pursuant to this Court's Order dated March 10, 2006:

a. \$900 will be distributed via check made out to Defendant Tripp and her counsel, Anthony McDonald, to cover support payments that were in arrears;

b. \$3,000 will be distributed to the law firm of Pepper Hamilton LLP on behalf of the Saver Plan, which the Parties agree represents the reasonable attorneys' fees and costs incurred by the Saver Plan in litigating this Action;

c. The remainder of the funds that were deposited into the interest bearing account with the Clerk of Courts on March 10, 2006, plus accumulated interest, will be distributed to the Defendant Estate.

2. Defendant Tripp and Defendant Estate are enjoined from instituting or prosecuting any proceeding in any state or United States court against the Saver Plan, Del Monte Corporation or the Plan Administrator for the Saver Plan for the recovery of proceeds under the Plan;

3. Defendant Tripp and Defendant Estate are enjoined from instituting or prosecuting any proceeding in any state or United States court

affecting the Saver Plan benefits involved in this Action pursuant to 28 U.S.C. §2361.

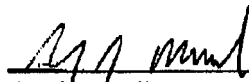
Upon signature and pending the entry of an Order by the Court, the terms of this Stipulation shall unconditionally and irrevocably bind all Parties.

Respectfully submitted,

Dated: May 18, 2006

/s/ Alice T. K. Corba

Alice T. K. Corba, Esquire
Kepner, Kepner & Corba
123 West Front Street
Berwick, PA 18603-4701
Phone: (570) 752-2766
Fax: (570) 752-7894
Attorney for Defendant
Estate of Paul Young



Anthony J. McDonald, Esquire
Dickson, Gordner, McDonald
and Hess
208 E. Second Street
Berwick, PA 18603-4804
Phone: (570) 759-9814
Attorney for Defendant Joann Tripp

/s/ Brian P. Downey

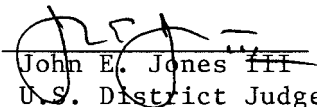
Brian P. Downey (PA 59891)
Stacey I. Gregory (PA 90290)
PEPPER HAMILTON LLP
200 One Keystone Plaza
North Front and Market Streets
P.O. Box 1181
Harrisburg, PA 17108-1181
Phone: (717) 255-1155
Fax: (717) 238-0575
Email: downeyb@pepperlaw.com
gregorys@pepperlaw.com

Of Counsel:

Kathleen Cahill Slaught
(CA 168129)
Seyfarth Shaw LLP
560 Mission St. Suite 3100
San Francisco, CA 94105
Phone: 415-544-1041
Fax: 415-397-8549
Email: kslaught@seyfarth.com

APPROVED BY:

Date: 5-22-06



John E. Jones III
U.S. District Judge

Attorneys for Plaintiff
The Del Monte Saver Plan